

Dear Chairman Powell and Commissioners Abernathy, Adelstein, Copps, and Martin:

Regarding the NOI Docket 03-104, Allegheny Energy Service Corporation is providing these comments for Monongahela Power Company, The Potomac Edison Company, and West Penn Power Company, all doing business as Allegheny Power. Allegheny Power is the electric distribution business of Allegheny Energy, Inc., with headquarters in Hagerstown, MD. We provide electric and natural gas service to about three million people in Maryland, Ohio, Pennsylvania, Virginia, and West Virginia (www.alleghenyenergy.com).

Our Comments:

1. Broadband over Power Line (BPL) is not only a viable competitor for broadband services, but it is also an efficient, cost-effective solution for distribution of the broadband signal throughout a consumer's home.
2. BPL is a technology that provides a competitive method for delivery of broadband services as well as a method for easy and inexpensive distribution of the broadband service throughout the home. It accomplishes both of these tasks using existing wiring. It does not increase the burden on the wireless spectrum, which is already in very short supply. Some competing technologies (satellite or terrestrial fixed wireless broadband, 802.11b,a,g,..., etc.) are very convenient, but are contributing to the spectrum shortage.
3. Another consumer benefit of BPL is that broadband would be accessible from any electrical outlet in the home, which could potentially develop into a standard for home networking, independent of whether the home is receiving BPL service from the outside.
4. BPL will bring broadband service to areas that cannot be served by the other major alternatives (DSL and CATV). Most of the Company's service area is rural, and many areas do not currently have the option of broadband service.
5. Rollout of BPL should directly and indirectly spur local economic growth.
 - a. It should create business opportunities for companies that provide and support broadband service, as well as companies that provide the associated equipment.
 - b. It should positively impact sales of computers and related items.
 - c. The availability of economically-priced broadband to more small businesses should have a positive effect on their viability and growth.
6. Because of these, and many other reasons, the Company believes that the deployment of BPL is in the public interest. The FCC should do everything possible to aid and encourage the rollout of BPL systems, as long as those systems are properly designed and planned.
7. In regard to concern over BPL interference with existing systems and technologies, the Company recognizes the need to satisfy legitimate concerns, however, we believe that many issues have already been resolved, because:
 - a. Electric utilities are traditionally very conscientious and cautious in their approach to communications technologies.
 - b. Due to our heavy reliance on wireless communications, we would not deploy a technology that knowingly causes interference, particularly if the interference is greatest in close proximity to our own infrastructure. Interference could have a devastating impact on our own operations.
 - c. It would not be in the Company's best interests to do anything that would cause interference for our customers. We value our relationship with our customers, and would not want to intentionally do anything that would adversely impact them.

This concludes our comments. Thank you for your consideration and please contact me with any questions or replies to these comments.

Sincerely,

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